Case 2:22-cy-01528-MRH Document 4 Filed 11/01/22 Page 1 of 96 17 W-\578
-UN 2nd United State Outsuct Court 701 The Western District of Pennsylvania Flourty, Civil action ND! Patricia A. Dott, It mority Security OCT 2 8 2022 Derwices the, CLERK, U.S. DISTRICT COURT FOR THE WESTERN DISTRICT Defendant.

U) Patrucio A. Docott reado at 1842

Washington Stroot; #304 Phone Number

H12-980-4399 Haidelberg Lennsylvania 15106. 1/2) Joint Moritz Derewitz Dervices Unc, Phone Number 412-885-8654, Corporate office Address, 4600 Clairton Bouleward, Pittsburgh, PA 15236. (3) 21/10 H2 U.S. CODO 12182 Public Accommodations Wolations.
(4) Defendants (Name) St. Moritz Decurity Denucers. Inc is under, the Lalus of the Statost Pennsylvania

and has its principal place of Business in Pittsburgh. (5) Wolations of Ilth 42 U.S. Code 1218201 Public accommodations, (6). Ewir Dince, plainty has been confined to her mobilized wheelchour she have limitations on her physical actrutier. Due Time, che made request for public accommodations but the Decurity Check point guard became Extremely mostile twood planning and the trew the security wheck point boint of not her was there, ony damonges done to her wheechour. Thorwayter, She has been doriled access to public accommodations Course the Decurity Check point Courses top is too right and its Very afficult for her to reach

from ner Wheelchour. I bounty contacted the downtown sheriffs deputy enforced the vow for the basket to be could but she quickly jierk it oway.

Afterwards, Dhe folt discompant in non body. Including against plainting guards began notation against plainting who contacted the downtown phenixis apartment against but triw time Dhe was incomment that the Charifle department didn't have any jurisdiction over 2th Morita Decurity Derwice the Stated that plaintiff resold among the Stated that plaintiff resold a mong the Stated that the Stated that

Disability Discrimation (i).

The August 15,2022, The entered into the City County Building Located at the City County Building Located at 414 Drant Street, Philaburoth, PA 414 Drant Street, when it was her 15219. Thereafter, when it was her

turn the immediately detect via against a dreabled victor. The Decurity Check point Counter top in too high par har to place has personal belongings include of the Decurity backet. Plainty made sev. eval requests for the on duty security Checkpoint guard to please Lower the basker to accommodate her but intend of appeating a senior citizen who is mandicapped the security quard made un readaire de mando por plaintiff to reach the warlet by herself to puther own items inside of it, she check point Decivily guard was very disreapectful and Lamber.

Disability Discrimation (1)

8. Once against on Deptember 13
2022, plainty entered into the City
County Building Located at 414 Mrani
County Building Located at 414 Mrani
Threat Pitteburgh, PA 15219, Fylten that
Time, one made a nequest for Public
Excommodation, The onduty Decurity
Guard decined to Lowered the Decurity
Theck baspet TO help plaintiff place her
fersonal belongings incide of the Decurity
Checkpoint baspet.

Disability Discremation (111)

9. One more time on Detaber 3, 2022, plaintiff entered into the city (surty Building
tiff entered into the city (surty Building
topated at 414 Grant Dtreet,
Located at 15219, 26e Security
Pittaburgh, PA 15219, 26e Security
Check fourt Counter top is high and
Lean the Grastet placed on it plaintiff
Was Physically in to place her personal
Lelong Lings in side of it.

The entreated the Decurity Check Point quand to give her a neighno hand but shortfunction let down to her hand reach so the would ve placed her personal belongings inside of the Decurity Check backet.

10. These disabilities discrimed tions occurred when plainty was physical unable to reach the high Decurity check point baskex to place her personal belongings in-Dide of It. And the wasn't permitted to use ADA customero Derwicer Lower Decurity basket for disables person ALDO, The was reprimended and

that, but she is a Denier with war also

deprived of using fullic accommodations. Additionally, whetreated differently from vistors that was Dianding and Naiking. Plug, the was repeatedly narassed. Furthermore, the was rebuted by the security check points guards. On top of that, Flain-tiff was emotional and verbal abused, Ditle 47 U.S. Code 12.182-Probilition of discrimination by Pulic accommodations

11. Pursuanto 42 U.S. Code 12182 (a) (B)
(a) Hereral Rule No individual Drall be
discriminated against on the basis of disshirty in the full and equal enjoyment
of the good, Dervices, facilities, primitiges,
asuantages, or alcommodation by any
person who owns, leases for leases to) or
operates a place of public accommodation.

Purpuant to 42 U.S. Code 12182from bition of discrimination by public accommodation. (B7-integrated Detting, Hood, Dervices, facilities, Privileges, advantages, and accommodation Drall be approached to an individual with a disability in the most integrated setting appropriate to the next of the individual.

airability Discrimation (i)

17. On August 15, 2022, plainty entered with the city County Building Located at 414 Hrant Street, Pittaburgh P 15219, Theroafter, when it was not two Dho immediately detect blad against a disabled vistor. The Decurity Check point Counter top is high for, nen to place ver personal. Lelongings incide of the Decurity Lasket.

Plaintiff mode Deveral requests to the on duty Decurity chack point guard to please when the backet to accommodate her but intend of availing a penior citizen who is transicarple the Decurity guard made unreadable demands for plaintiff to reach the backet by nevery to put nevown thems would of it. The check point Decurity quard was was very disrespectation of lambers.

Disability Discrimation (ii)

13, Once against, on September 13, 2022, plainty entered with the city County Building to cated at 414 Hrand Street, Pottsburgh, PA 15219. After that time the made a request for public accommodation. The on duty Security quard duction. The on duty Security quard duction to lowered the security check backet to help plaintiff place har

Case 2:22-cv-01528-MRH Document 4 Filed 11/01/22 Page 10 of 16 Personal belongings inside of the Decurity check point backet. Disability Discrimation (111) 14. One more time, on October 3, 2022, plaintiff entered into the city County Building Located at 414 Krant Street, Pittobwigh, PA15219, The Decurity check point counter top to high and With the booket placed on it plaintly mas Physically unable to place har . Reroonal belongings indically the paintguard to give nera helping none, but she refused to let it down TO har hand reach so she would'us placed var personal berongings incide of it. And she wasn't permitted to word Derwices lower Decurity vasket for a disabled per-Don.

15, ALTO, Dhe was reprimand and The was versally attached. Notonly that out she was serior citizen who is trandicapped. Likewill shewar also deprived of using public accommodations. Additionally, Dre was treated differently from vistors that was standing and walking Plus, she Mas repeatedly rarapped. Further-more shower rebuted by the security check point guards. On top of that, plainty was emotional and verbal Obulla,

Age Discrimination
16 Flaintigh is a elderly person! The
nowed physical impairment, more than
that, she was treated unfourly because
of her age, which is another wishation
of Pennsylvania elderly abuse
law, the was subject to an adverso
age action; that Dub Stantially

younger persons was not yelled at not were they harassed. Flown-Up believe she was sought out from which who was deprivation; of using Rublic accommodations; that who was a qualified wheelchaus bound customer to use the lower 40 A security a belongings inside of the person was rejected.

Purplicant to U.S. Code 12182 Prohibition of discrimination by Public accommodations

17. (a) General Rule

No individual Dhau Lediscriminated against

on the Gasis of disability in the full and explose

enjoyment of the good, service reculties

enjoyment of the good, service reculties

priviles, advantages, on accommodation

of any place of public accommodation

of any place of public accommodation

by any person who swing, leases (or leases

by any person who swing, leases (or leases

to, or operates a place of public

ument 4 Filed 11/01/22 Page 13 of 16 accommodation. (b). Construction (1). General Prohibition (A) Activities (1). Derial of participation It shall be discriminatory to Dubject on the bases of dieability or disabilities of such individual or class, directly, or through contractual, licensing or other arrangements with the opportunit to patricipate in orbenefit from agood, Service, pacility, Primitage, advantage, or accommodation that is not equal to that appointed to others individuals.

(iii) Expanded teapper,

an inaccided on closer of inaccided on the basis of a disability on disabilities

Case 2:22-cv-01528-MRH Document 4 Filed 11/01/22 Page 14 of 16

of such individual or class, directly, or through contractual, excensing, or ther arrangement with a good, services facility privilege advantage on accommodation that is different or Deparate from that provided to other individual, unless such action to recessory to provide the individual Executty, primilege aduantage or accommodation on other apportunity that to as effectives as that provided others.

Plainty Deek revier for LOWERT atternate Special design top to accommodate wholehows usars to be inside the city burty Building located at 414 Mont Street, Pittsburgh, PA15219. Plainty Deek relief for the st mority Derwices Ino Decurity Check point guarde to restrains from there discrimi Notory perjudical treatments toward guest With Physical impourments.

Concusion

Accordingly, for all of the forgoing reasons, plaintiff reverence request that this court grant her pray for review and such others review that this Court deems to be appropriate in her civil Complain.

Respectfully Dubmitted

Strucia A. Scott "Prose"

1842 Washington Struct #304

Helder Bon October 14,2022

By: Potricio A. Douth "Prose

By: Potricio A. Douth "Prose